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April 11, 2022

Honorable Ronnie Abrams United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007 Letter Motion: Second Request for Extension of Time

Re: Tijuana S. Reynolds v. Comm'r of SSA 1:21-cv-05901-RA

Dear Honorable Judge Abrams:

Pursuant to the Scheduling Order in the above referenced case, Plaintiff's motion for Judgment on the Pleadings is due on April 12, 2022. Plaintiff writes to respectfully request the Court's indulgence with a second request for an extension of time to serve her motion. Plaintiff expected to complete her brief herein in compliance with the revised scheduling order but was unable to do so due to staffing issues and multiple motions coming due on or about the same date. Plaintiff therefore writes to respectfully request a second extension of time of sixty days (60), up to and including June 11, 2022, to serve her motion, with the remaining Order to remain in effect. The Defendant has been consulted and consents to this request. Thank you in advance for the Court's consideration.

Respectfully Submitted,

/s/Eddy Pierre Pierre

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Cc: Scott Elliott, Esq.(Via ECF)

Jason Peck, Esq. (Via ECF) Attorneys for Defendant. Hon. Ronnie Abrams

SO ORDERED.

Application granted. No further extensions

will be granted absent good cause.

4/12/22